

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DEANA HOUGHTON,  
Plaintiff,  
vs.  
SAFeway, INC., a Delaware Corporation,  
Defendant.

No. 2:21-cv-00030

**NOTICE OF REMOVAL TO  
FEDERAL COURT**

Please take notice that Defendant Safeway Inc. hereby removes to the United States District Court for the Western District of Washington the action described below. On November 16, 2020, Defendant Safeway Inc. was served with a summons (**Attachment 1**) and complaint (**Attachment 2**) in an action entitled *Deana Houghton v. Safeway, Inc. et al.*, King County Superior Court No. 20-2-16594-8. The first date upon which Safeway Inc. received a copy of this complaint was November 16, 2020.

The complaint does not specify the amount of damages being claimed by the Plaintiff. On November 19, 2020, Safeway propounded a request for a statement of damages and discovery requests which asked Plaintiff to disclose the damages Plaintiff is claiming in this matter. On December 14, 2020, Plaintiff provided Safeway with a

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FEDERAL COURT - 1**

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6523 California Ave SW #454  
Seattle, WA 98136  
(206) 659-0679

1 statement of damages claiming more than \$67,000 in special damages and \$340,000 in  
2 general damages, plus loss of income in an amount that has not yet been determined.

3 There is complete diversity because the Plaintiff is a citizen of the State of  
4 Washington and Defendant Safeway Inc. is a corporation organized under the laws to the  
5 State of Delaware with its principle place of business in the State of California.

6 This court has original jurisdiction over this action pursuant to 28 U.S.C. §1332(a)  
7 because it is between citizens of different states and the amount in controversy exceeds  
8 \$75,000. This claim is removable to federal court by the defendant pursuant to 28 U.S.C.  
9 §1441 based on diversity jurisdiction.

10 **INTRADISTRICT ASSIGNMENT**

11 The case is currently pending in King County so LCR 3(e) indicates it will be  
12 initially assigned to a Seattle Judge.

13 A civil case cover sheet is attached as **Attachment 3**.

14 TURNER KUGLER LAW, PLLC

15 By: \_\_\_\_\_ s/ John T. Kugler  
16 John T. Kugler, WSBA # 19960  
Attorney for Defendant

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## **CERTIFICATE OF SERVICE**

I hereby certify that on January 11, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

none

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

Attorney for Plaintiff:

Christian Pearson

Gagley Law Group LLP

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Kent, WA 98030

[christian@gagleylaw.com](mailto:christian@gagleylaw.com)

s/ John T. Kugler

JOHN T. KUGLER, WSB #19960

Attorney for Defendant Safeway Inc.

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**NOTICE OF REMOVAL TO  
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